

ICU Atlanta LLC

Robocall Mitigation Plan

Date: September 22th, 2025

ICU Atlanta LLC (ICU) provides technical consulting and IPES telco services to clients. Accordingly, ICU relies in part on procedures, policies, and safeguards required by The FCC to ensure that ICU's residential and business customers are sufficiently protected against robocall and spoofing activities.

Traceback

ICU responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperates with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

STIR/SHAKEN

ICU has fewer than 100,000 voice subscriber lines and only supplies voice services to end-user and does not provide any services to wholesalers or act as a wholesaler.

On behalf of ICU, ClearIP will authenticates all of ICU's end-user voice traffic using STIR/SHAKEN.

The remainder of the voice traffic that ICU originates on its network is subject to robocall mitigation program described below.

Robocall Mitigation Program

ClearIP uses call analytics provided by to monitor ICU's outbound voice traffic in real time to prevent the origination of illegal robocalls. The software identifies calling patterns that would indicate robocall activity, such as an unusual number of calls from a telephone number and/or an unusual number of short duration or incomplete calls. The software provides detailed reporting identifying suspected illegal robocalls. The software also provides alerts where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. There is an immediate investigation of any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, then ICU either warns them to stop or terminates their service, as appropriate pursuant to its business policies.